

2217-811

8/14/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 14, 2014

James Kunstman
PBI/Gordon Corp.
1217 W. 12th Street
P.O. Box 014090
Kansas City, Missouri 64101-0090

Subject: Label Notification per PRN 98-10 – (adding warranty and marketing claims)
Product Name: EH1328 Weed and Feed
EPA Registration Number: 2217-811
Application Date: 8-6-14
Decision Number: 494285

Dear Mr. Kunstman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, you may contact Erik Kraft at 703-308-9358 or via email at kraft.erik@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Montague".

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval Expires 2-28-95

 United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 2217-811	2. EPA Product Manager Kathryn V. Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) EH 1328 Weed and Feed	PM# Product Manager—Team 23	
5. Name and Address of Applicant (Include ZIP Code) PBI/Gordon Corporation Post Office Box 014090 Kansas City, Missouri 64101 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

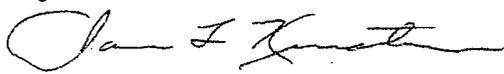
Notification Per Pesticide Registration Notice (PRN) 98-10: Section II (N): Other revisions, Section IV (C) and (E)
Labeling notification: Please refer to the cover letter for the description of our request and the certification statement.

e-mail to jkunstman@pbigordon.com FAX: 816-421-2731

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per Container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 15,16,17,18,20 and 36 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph		<input type="checkbox"/> Other _____	
		<input checked="" type="checkbox"/> Paper glued			
		<input checked="" type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name James L. Kunstman, Ph.D.	Title Director of Regulatory Services	Telephone No. (Include Area Code) 816-460-6292
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Director of Regulatory Services	
4. Typed Name James L. Kunstman, Ph.D.	5. Date August 6, 2014	



1217 W. 12th STREET · P.O. BOX 014090
KANSAS CITY, MISSOURI 64101-0090
816-421-4070 · 1-800-821-7925
FAX: 816-474-0462

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August 6, 2014

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202-4501
Attn: Kathryn V. Montague, PM-23

Dear Ms Montague:

NOTIFICATION: Labeling notification per PRN 98-10: Notifications, Non-notifications and Minor Formulation Amendments. Section II (N) and IV(C) and (E): EH 1328 Weed and Feed (EPA Reg. No. 2217-811)

I. Labeling notification:

Section II (N): Other revisions.

- **Request for advertising/marketing claims.**
We ask to add additional advertising claims. Please refer to page 7, 8, 9 and 10 of the draft label.

Section IV(C) and (E)

- Include the addition of a Non-FIFRA related label element by placing state-required analysis of the fertilizer component of the product on page 1.
- We also ask to re-format portions of the label to ease the comprehension of the label, and make it consistent with other approved product labels. These formatting changes can be seen on pages 4, 5, 6, 7 and 10 of the enclosed draft labeling.

One copy of the proposed labeling with annotations and one copy of the draft labeling without notations are enclosed for your review.

II. Certification statement:

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Section 12 and 14 of FIFRA.

III. Enclosures:

1. Application for Pesticide Amendment (EPA Form 8570-1)
2. One (1) copy the draft labeling with annotations.
3. One (1) copy the draft labeling without notations.

If you have any questions, please call me at 816-460-6292 or contact me at jkunstman@pbigordon.com

Sincerely,

James L. Kunstman, Ph.D.
Director of Regulatory Services

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, socks, shoes and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not give anything by mouth to an unconscious person. Do not induce vomiting unless told to by a poison control center or doctor.
If on skin or on clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

[Environmental Hazards (alternate per PRN 2008-1)]

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.]

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

PRECAUTIONS AND RESTRICTIONS:

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until dusts have settled.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.
- Do not use this product where desirable clovers are present. Apply when the air is calm. Do not apply to newly seeded lawns until after the third mowing.
- Do not use this product on or near desirable plants, and avoid spreading granules onto exposed root systems or adventitious shoots (rhizomes) within the drip line of desirable trees and shrubs, since injury may result.
- Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.

WHERE TO USE:

EH1328 Weed and Feed controls a wide range of lawn weeds including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a [X-X-X] fertilizer provides a supply of plant food. Supplemental nitrogen, phosphorous, and potash should be applied according to soil tests or State Extension Service recommendations.

EH1328 Weed and Feed controls broadleaf weeds commonly found in cool season and warm season turfgrass established in residential areas. Established turf of Kentucky bluegrass, fescues, and perennial ryegrass may be treated. Established turf of bermudagrass, zoysiagrass, St. Augustinegrass, and centipedegrass may be treated. Residential areas include turfgrass established around residences, apartment complexes, condominiums, vacant lots, or areas associated with households.

Do not apply this product to carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers.

APPLICATION INSTRUCTIONS:

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering (see step 4).
3. Apply when weeds are young and growing actively, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to allow the granules to adhere and to remain on the leaf surface of the weeds.
4. Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

APPLICATION INSTRUCTIONS: (Optional Tabular Format)	
Application Schedule	Cultural Practices
1 to 2 days before application	Mow lawn to normal height 1 to 2 days before application.
1 day before application	Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering.
Day of application	Apply when weeds are young and growing actively, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to hold the material.
1 to 2 days after application	Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescues, and perennial ryegrass, bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass: Apply 3.0 to 3.6 pounds of product per 1,000 square feet of

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turfgrass. A second or follow-up application may be required for dense infestations of weeds or for adverse seasonal conditions. The second application of 3.0 to 3.6 pounds of product per 1,000 square feet must be made at least 30 days after the first application. Do not apply this product to 'Floratam' St. Augustinegrass in Florida.

The maximum broadcast application rate is 3.6 pounds of product per 1,000 sq.ft. per application (1.02 lb 2,4-D ae, 0.2 lb MCPP-p ae and 0.05 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 7.2 pounds of product per 1,000 sq.ft. (2.04 lb 2,4-D ae, 0.40 lb MCPP-p ae and 0.10 lb dicamba ae per acre).

A uniform distribution of product on the treated area is essential. Choose a calm day to ensure uniform coverage and to avoid spreading granules onto flowers, vegetables, and ornamental shrubbery. Do not exceed the application rate for any area.

Drop spreaders and rotary spreaders should be calibrated for uniform applications of this product.

CALIBRATION INSTRUCTIONS:

[Note to Supplemental Registrants: Refer to table for appropriate bag sizes.]

- For 3.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 330 square feet and adjust to apply at the rate of 1 pound of product per 330 square feet.
- For 3.2 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- For 3.4 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 300 square feet and adjust to apply at the rate of 1 pound of product per 300 square feet.
- For 3.6 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.

[Coverage: To determine the square footage of the application area, multiply the length of the lawn by its width. This equals your total square footage. Deduct any non-lawn areas (driveway, sidewalk, house, etc.) One bag covers XXXX sq.ft. or XX-pounds per 1,000 sq. ft.]

[sq.ft. calculation image Length x Width = Total Sq.Ft. -- Non-Lawn Area = Total Sq. Ft. Coverage you need]

[Spreader Settings [spreader images]

Calibrating spreader: Adjust spreader to apply X pound of product per XXX sq.ft.

Spreading patterns: First spread the borders of your lawn. Then spread the center by spreading in straight line passes. Spread at a uniform walking speed to ensure even coverage [spreading pattern image(s)]

[Note to Supplemental Registrants: Select the appropriate bag size and present only the information provided for that bag size on your product labeling. Also, the following language on equipment settings of drop spreaders, rotary spreaders, and other granular applications is optional – it may be presented on the container labels at your discretion]

Bag Size, Pounds	Application Rate, Pounds/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet	Bag Size, Pounds	Application Rate, Pounds/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet
15	3.0	5,000	18	3.0	6,000
	3.2	4,700		3.2	5,600
	3.4	4,400		3.4	5,300
	3.6	4,200		3.6	5,000

Bag Size, Pounds	Application Rate, Pounds/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet	Bag Size, Pounds	Application Rate, Pounds/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet
16	3.0	5,300	20	3.0	6,600
	3.2	5,000		3.2	6,300
	3.4	4,700		3.4	5,900
	3.6	4,400		3.6	5,600
17	3.0	5,600	36	3.0	12,000
	3.2	5,300		3.2	11,200
	3.4	5,000		3.4	10,600
	3.6	4,700		3.6	10,000

SPREADER PATTERNS AND PRODUCT DISTRIBUTION:

1. Apply two header strips.
2. Operate spreader the longest way of the lawn.
3. For drop spreaders, overlap wheels to ensure complete coverage.
4. Close spreader openings when turning.

SINGLE PASS DISTRIBUTION:

First spread the borders of your lawn. Then spread the center by spreading in straight line passes. Spread at a uniform walking speed to ensure even coverage [Graphics Optional]. To avoid gaps and streaks, first spread the border and fill in center with uniform, parallel passes.

Coverage - To determine how much you need to apply, multiply the length of your lawn by its width. This equals your total square footage. Deduct all non-lawn areas (house, gardens, etc.). One bag covers up to XXX square feet. [Graphics Optional]

[End optional language]

BROADLEAF WEEDS			
Annual yellow sweetclover	Cockle	Musk thistle	Spiny amaranth
Aster	Cocklebur	Mustard	Spiny cocklebur
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spiny sowthistle
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted catsear
Beggarticks	Cudweed	Nettle	Spotted spurge
Betony, Florida	Curly dock	Orange hawkweed	Spurweed
Bindweed, field	Daisy, English	Oriental cocklebur	Stinging nettle
Bird vetch	Daisy fleabane	Oxalis	Strawberry, India mock
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall nettle
Bittercress, hairy	Dandelion	Parsnip	Tall vervain
Bitterweed	Dichondra	Pearlwort	Tansy ragwort
Black-eyed Susan	Dogbane	Pennycress	Tansy mustard
Black medic	Dogfennel	Pennywort	Tanweed
Black mustard	Dollarweed	Peppergrass	Thistle
Blackseed plantain	Elderberry	Pepperweed	Trailing crownvetch
Blessed thistle	False dandelion	Pigweed	Tumble mustard
Bloodflower milkweed	Falseflax	Pineywoods bedstraw	Tumble pigweed
Blue lettuce	False sunflower	Plains coreopsis (tickseed)	Velvetleaf
Blue vervain	Fiddleneck	Plantain	Venice mallow
Bracted plantain	Florida pusley	Poison ivy	Virginia buttonweed
Brassbuttons	Frenchweed	Poison oak	Virginia creeper
Bristly oxtongue	Galinsoga	Pokeweed	Virginia pepperweed
Broadleaf dock	Goathead	Poorjoe	Water pennywort
Broadleaf plantain	Goldenrod	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Ground ivy	Prickly lettuce	Western clematis
Buckhorn	Gumweed	Prickly sida	Western salsify
Buckhorn plantain	Hairy fleabane	Prostrate knotweed	White mustard

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APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Weight: _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

Herbicide Benefit Claims:

- 3-way active ingredient for optimum weed control
- [Apply] [Use] when weeds are [actively] growing
- Weed control works through foliage contact
- Controls dandelion, chickweed, knotweed, plantain, henbit, spurge and other broadleaf weeds.
- Controls dandelions, thistle, clover, and over [XXX] other listed weeds
- Controls dandelion and over [XXX] broadleaf weeds
- Controls [over] [XXX] [broadleaf] weeds

Fertilizer Benefit Claims:

- Contains slow release nitrogen for long lasting feeding without burning, when applied as directed.
- [Contains] Slow release nitrogen for a longer lasting green lawn
- [Controlled] [Slow] release nitrogen for extended feeding
- Fortified with Milorganite® [for use only on formulations containing milorganite]
- Nitrogen [XX] Promotes thick, green turf
- Phosphorus free [formula] [for use on formulation containing zero phosphate]
- Phosphorus 0 No phosphate runoff into lakes and streams [for use on formulations containing zero phosphate]
- Potassium [XX] Strengthens grass against disease
- Contains Iron for deep greening
- Deep greening formula
- Prepares your lawn for winter
- Formulated to promote root building and winter hardiness
- Nourishes all winter for a quick spring green-up
- Better green-up next spring
- Continual root development for a thick, lush lawn
- Promotes a thick, lush lawn
- Builds strong roots
- Stimulates root growth
- Consistent blend/consistent feeding
- Continues to feed for [XX] weeks [months]
- Healthy lawns require less water

General Marketing Claims:

- A granular fertilizer containing Trimec® herbicide which controls: dandelion, chickweed, knotweed, plantains, henbit, spurge and many other broadleaf weeds [some of which are listed on the back panel]
- A Granular Fertilizer Containing Trimec® Herbicide Which Controls: [weeds]
- (Fifteen, Sixteen, Seventeen, Eighteen, or Twenty) Pounds Covers Up To 5,000 Square Feet.
- Answers to FAQ's on the internet at www.xxxx.com
- Lilly Miller Ultragreen [product] feeds and protects all year long!
- Broad spectrum weed control & fertilizes in one application
- Specially formulated to control weeds and prepare your lawn for Winter dormancy

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- Fourth application
- Late Aug to Nov
- Slow release nitrogen for long-lasting feeding
- Enhances root building and prepares your lawn for winter dormancy

3. State mandated fertilizer labeling requirements:

[Note to Supplemental Registrants: Please select the statements relevant to the areas of the country in which your specific product is registered and sold; if any of these statements are relevant to your labeling, please place in the Directions for Use under the heading "3.1 State Restrictions"]

- California, Oregon, Washington: "Information regarding the contents and levels of metals in this product is available on the internet at <http://www.aapfco.org/metals.htm>"
- Florida: [Note to reviewer: maximum number of applications in this section is dually based upon maximum ai load as well as fertilizer analysis effect on maximum nitrogen rates in different regions in Florida]:
 - In North Florida: Do not exceed X applications per year on bermudagrass. Do not exceed X applications per year on centipedegrass. Do not exceed X applications per year on St. Augustine grass. Do not exceed X applications per year on zoysiagrass.
 - In Central Florida: Do not exceed X applications per year on bermudagrass. Do not exceed X applications per year on centipedegrass. Do not exceed X applications per year on St. Augustine grass. Do not exceed X applications per year on zoysiagrass.
 - In South Florida: Do not exceed X applications per year on bermudagrass. Do not exceed X applications per year on centipedegrass. Do not exceed X applications per year on St. Augustine grass. Do not exceed X applications per year on zoysiagrass.
- Idaho: "Apply only as directed"
- Maryland: "This fertilizer contains phosphorus and may not be used on turf in the state of Maryland except when 1) Providing nutrients to specific soils and target vegetation as determined to be necessary in accordance with a soil test that was conducted by a laboratory identified under § 8-803.7 of the Agriculture Article, Annotated Code of Maryland, performed no more than 3 years before the application; 2) Establishing vegetation for the first time, such as after land disturbance, provided the application is conducted in accordance with the recommended application rates established by the State; or 3) Reestablishing or repairing a turf area."
- New Jersey: "In the state of New Jersey, this product may be used only when 1) Providing nutrients to specific soils and target vegetation as determined to be necessary pursuant to a soil test conducted by a laboratory identified pursuant to subsection b. of section 6 of P.L.2010, c.112 (C.58:10A-66) and performed no more than three years before the application, and pursuant to the associated annual fertilizer recommendation issued by the New Jersey Agricultural Experiment Station at Rutgers, the State University; 2) Establishing vegetation for the first time, such as after land disturbance, provided the application is in accordance with the standards and requirements established under the "Soil Erosion and Sediment Control Act," P.L.1975, c.251 (C.4:24-39 et seq.) and the rules and regulations adopted pursuant thereto; 3) Reestablishing or repairing a turf area; or 4) Delivering liquid or granular fertilizer under the soil surface, directly to the feeder roots."
- New Hampshire: In the state of New Hampshire, this product may only be used on 1) Establishing new lawns, for repairing a lawn, for seeding, or for use when a soil test indicates a phosphorus deficiency.
- Virginia: "In the state of Virginia, this product may be used only on 1) Newly established turf areas from sod or seed during the first growing season; 2) Turf areas being repaired or renovated, and; 3) Turf areas where soil tests performed within the past three years indicate nutrient deficiency."

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00811.20140806.notif-proposed-clean

2. Reason for Issue: ad claims, reformat, typos